

Daniel R. Watkins, Esq.
Nevada State Bar No. 11881
dw@wl-llp.com
WATKINS & LETOFSKY, LLP
8935 S. Pecos Rd., Ste 22A
Las Vegas, NV 89074
Office: (702) 901-7553; Fax: (702) 974-1297
Attorneys for Plaintiff, Thomas Liolios

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS LIOLIOS,

Plaintiff,

vs.

American Wagering, Inc. D/B/A William Hill
Us a Domestic Corporation; DOES 1-50;
inclusive,

Defendants.

Case No.: 2:23-cv-00074-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR FILING
RESPONSE TO MOTION FOR
SUMMARY JUDGMENT**

[FIRST REQUEST]

American Wagering, Inc. (Defendant) and Thomas Liolios (Plaintiff), by and through their respective counsel, stipulate and hereby agree to an extension of Plaintiff's deadline for filing a response to the Defendant's Motion for Summary Judgment. The Parties represent and show the court as follows:

1. Defendant filed a Motion for Summary Judgment on October 13, 2023 [ECF No. 17]. The deadline to respond to this Motion was originally set for November 3, 2023.
2. Plaintiff has requested, and Defendant stipulates, to an extension because one of the attorneys representing Plaintiff left the firm, and remaining counsel had a scheduled surgery. The matter was subsequently assigned to a new attorney within Plaintiff's law firm, and the parties engaged in brief but unsuccessful settlement discussions. New counsel is traveling, and calendars require two (2) extra business days to oppose the Motion for Summary Judgment as a result.

Based on the above, good cause exists for the proposed extension of the deadline for filing the response to the Motion for Summary Judgment. Plaintiff believes, and Defendant does not dispute, that the requested extension is necessary. Based on the foregoing, the parties have agreed that the deadline for filing dispositive motions should be extended until Tuesday November 7th, 2023.

This is the parties' first requested extension of the summary judgment opposition deadline.
DATE: November 3, 2023

WATKINS & LETOFSKY, LLP

FENNEMORE CRAIG, P.C.

/s/ Daniel R. Watkins

/s/ MaryJo E. Smart

Daniel R. Watkins, Esq.
Nevada State Bar No. 11881
dw@wl-llp.com
8935 S. Pecos Rd., Ste 22A
Las Vegas, NV 89074
Office: (702) 901-7553; Fax: (702) 974-1297
Attorneys for Watkins & Letofsky, LLP

Shannon Pierce, Esq.
Nevada State Bar No. 12471
spierce@fennemorelaw.com
Maryjo E. Smart, Esq.
Nevada State Bar No. 16139
msmart@fennemorelaw.com
FENNEMORE CRAIG, P.C.
7800 Rancharra Parkway
Reno, Nevada 89511
Telephone: (775) 788-2200

ORDER

Based on the foregoing stipulation of the Parties, and for GOOD CAUSE appearing, IT IS HEREBY ORDERED that the deadline for Plaintiff to oppose ECF No. 17 is hereby **GRANTED *nunc pro tunc*** from November 3, 2023 to November 7, 2023.

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

Dated: November 6, 2023